

Tel: (601) 892-6462

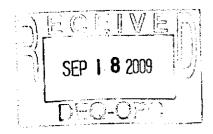
Fax: (601) 892-6476

Email: athomas a kuhlman.com

101 Kuhhnan Drive • Crystal Springs, Mississippi 39059 Website: www.kuldman.com Power Transformers Instrument Transformers Distribution Transformers

September 17, 2009

Mr. Tony Russell
Assessment Remediation Branch Chief
Mississippi Department of Environmental Quality
P. O. Box 2261
Jackson, MS 39225



Dear Tony;

I am writing today to summarize the excavation of potentially impacted soil and concrete to a) repair a floor in the Winding Department, b) construct a pit to recess supporting rails for transporting loads to the Vapor Phase manufacturing process, and c) to recess a drip pan in the concrete floor of the Assembly Department in the Kuhlman Electric facility in Crystal Springs, MS. Figure 1 illustrates the approximate locations inside the Crystal Springs facility. Figures 2-4 illustrate the area following construction.

KEC completed the three projects in July of 2009. The Winding Department floor repair is the subject of the March 23, 2009 letter to MDEQ, the Vapor Phase Rail Pit is Phase II of the letter of September 23, 2008 and the Assembly Department Drip Pan is the subject of the letter of July 1, 2009.

Walker Hill Environmental was contracted to excavate the soil and concrete for all three areas. Walker Hill was selected because they have completed several environmental projects competently at the KEC site in past years.

Soil and concrete was removed to covered roll-offs. Composite samples of each of the roll-offs were taken. Analysis (found in Micro Methods report in Appendix I) for PCB concentration was completed on the composites. Analysis showed that Arochlor 1260 was present in the soil at concentrations less than 10 mg/kg.

Work to remove the soil was conducted during a plant shutdown when the plant was nearly empty of KEC personnel. KEC employees were informed of the excavation prior to its taking place.

Soil was disposed of in accordance with regulatory requirements. Manifests of the roll-offs are included as Figures 5 thru 11 inclusive.

Please call me @ 601-892-6462 with any questions or comments.

Alan Thomas

Sincere

Maintenance Manager

Cc: Messrs. Paul Acheson, Phillip James, KEC; Ms. Anastasia Hamel/ Borg Warner/ Mr. Steve Levine/ Phelps, Dunbar, Mr. James Barrett/Latham and Watkins

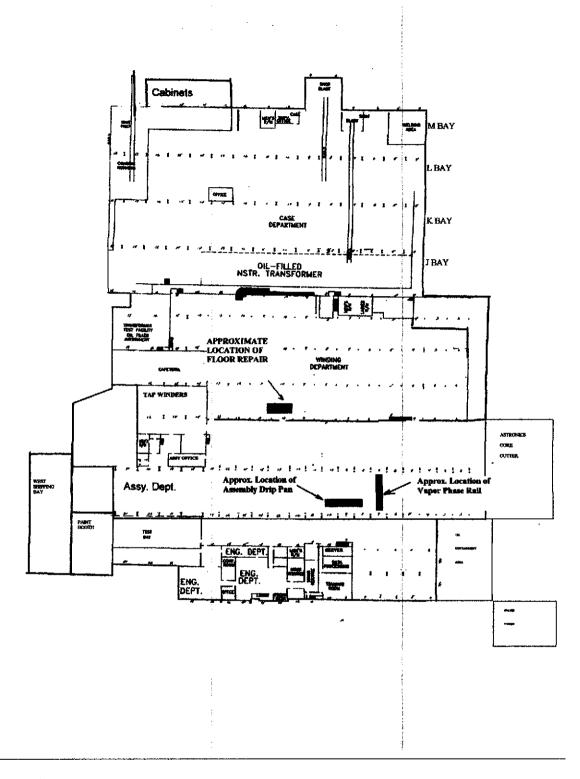
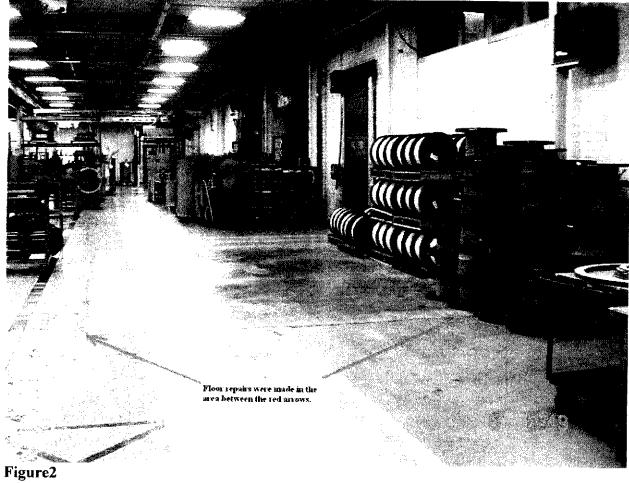


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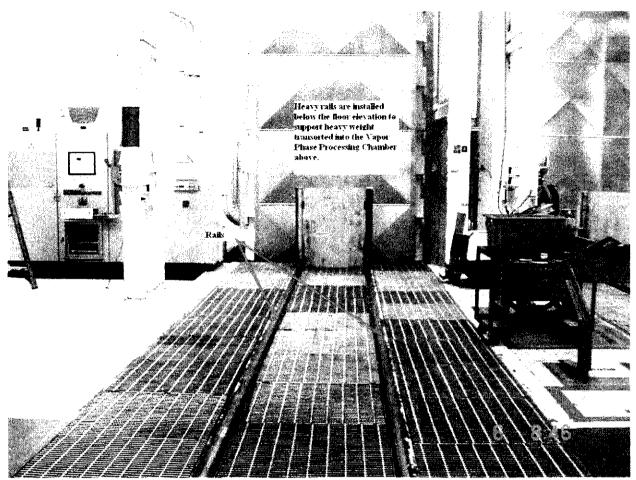


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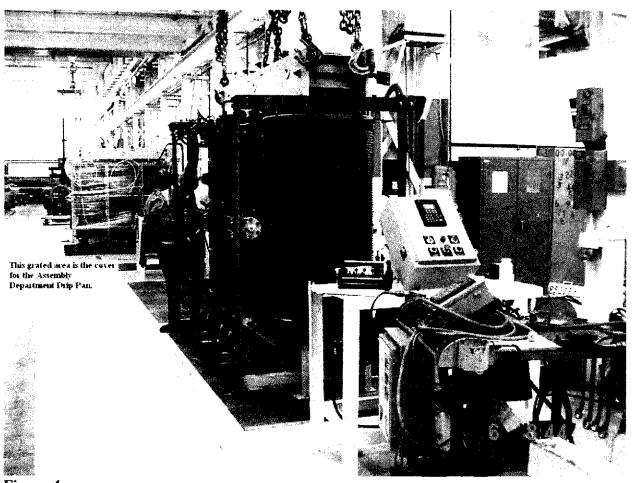


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Figure 11

APPENDIX I



August 27, 2009

Mr. Alan Thomas Kuhlman Electric Corporation 101 Kuhlman Drive Crystal Springs, Mississippi 39059

Re: Concrete Cutting Soil, Water, and Air Sampling Kuhlman Electric Corporation

Crystal Springs, Mississippi

Dear Mr. Thomas:

Environmental Management Services, Inc. (EMS) has prepared this report for a round of soil, water, and air sampling associated with three floor cutting events at the Kuhlman Electric Corporation (KEC) facility in Crystal Springs, Mississippi. Cut #1 was located in the southern portion of the Winding Department, Cut #2 was located in front of the Core Department Supervisor's Office, and Cut #3 was located in front of the Vapor Phase Unit in the Core Department. The locations of the three cuts are shown on Figure 1.

Six soil samples and one water sample were collected on July 6, 2009 and July 20, 2009 by EMS. The samples were analyzed by Micro-Methods Laboratory, Inc. for Polychlorinated Biphenyls (PCBs) by Environmental Protection Agency (EPA) Method 8082. Additionally, three air samples were collected during the excavation of the concrete slab and analyzed by EMSL Analytical by EPA Compendium TO-15. The air samples were collected using specially-prepared summa canisters. The sample locations are shown on Figure 2.

Seven of the soil samples were collected from the containers storing the soil, one soil sample was collected from the cutting solids, and the water sample was collected from water used as a cooling agent/lubricant during the cutting process. All of the soil samples and the cutting solid sample contained detectable levels of PCB-1260. Three of the soil samples (05 Cutting Solids, 11 RB-022510), and 12 RB-0324304) exceeded the Mississippi Department of Environmental Quality's (MDIS) Tier 1 Target Remedial Goals (TRGs) for unrestricted soils of 1.0 milligrams per kilogram (pp/kg). The water sample obtained from the cutting water did not exhibit any

concentrations of PCBs above their respective reporting limit. The analytical results are included in Table 1, and a copy of the laboratory analytical report is included as Attachment 1.

The laboratory analytical results indicated all air samples contained VOC concentration above their respective reporting limit. The samples did not exceed the Occupational Safety and Health Administration's (OSHA) or the National Institute for Occupational Safety and Health's (NIOSH) standards for the compounds analyzed. The analytical results are included in Table 2, and a copy of the laboratory analytical report is included as Attachment 2.

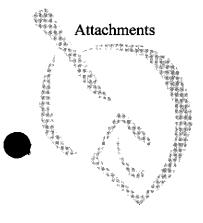
In addition to the previously mentioned sampling and analysis, the air in the immediate work area was monitored using a photo ionization detector (PID), a flame ionization detector (FID), and a four gas meter. The FID and PID monitors did not detect any exceedingly high readings during the cutting and excavation. The four gas meter detected a high carbon monoxide (CO) reading of 37 parts per million (ppm) at Cut #1 following the concrete cutting. This elevated reading was determined to be due to the operation of diesel equipment in the vicinity. It was noted that the levels dropped to the 0-12 ppm range shortly after the elevated reading was taken. Another elevated CO reading of 33 ppm was detected with the four gas meter at Cut #3. The elevated reading was believed to be caused by equipment exhaust. The readings from these monitors are listed in the field notes that are included as Attachment 3.

We appreciate the opportunity to provide these environmental services for you. If you have any questions regarding this report please contact me.

Sincerely,

Environmental Management Services, Inc.

Ethan Allen, P.G. Project Geologist



FIGURES

